

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

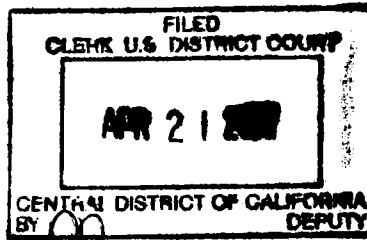
DAVID E. CONRAD
DEONTE SPICER
JAMES LEE
PLAINTIFF'S

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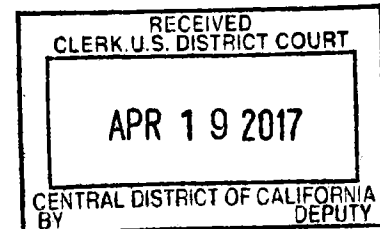
CLASS ACTION CIVIL
ACTION/COMPLAINT
UNDER BIVENS (EMERGENCY
REVIEW REQUESTED DUE
TO HEALTH AND HARM OF
PLAINTIFFS*)

JOHN DOE #2
F. RUTLEDGE
D. SHINN
JOHN DOE #1
J. BUNSOLD
D. DEGOEY
E. VELEZ
MORENO
C. HERRERA
DEFENDANT'S

CASE No:
ED CV17-00770-JGB(DFM)



SUED IN THERE INDIVIDUALL
AND OFFICIAL CAPACITIES



DAVID CONRAD DC David Conrad

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PAGE 1

I. JURISDICTION AND VENUE

1. THIS PRO SE CLASS ACTION COMPLAINT IS BROUGHT UNDER BIVENS TO REDRESS THE DEPRIVATION, UNDER THE COLOR OF LAW OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THIS COURT HAS THE JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1343 (a) (3). THE CLASS ACTION COMPLAINT IS AUTHORIZED UNDER RULE 23 (a) OF TITLE 28 OF THE U.S.C. THE PLAINTIFFS ALL SEEK DECLARATORY RELIEF PURSUANT TO 28 U.S.C. SECTION 2201 AND 2202. PLAINTIFFS CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 2283 AND 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE, AS WELL AS THE PLAINTIFF'S T.R.O. REQUESTS. VIOLATION OF CA STATE CODE 845.7 IS ALSO INCLUDED IN THIS COMPLAINT.

2. THE CENTRAL DISTRICT OF CALIFORNIA IS THE APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1391 (b) (2) BECAUSE IT IS THE JURISDICTION WHERE THE EVENT'S GIVING RISE TO THIS COMPLAINT OCCURRED.

THE EVENTS OCCURRED IN VICTORVILLE
 U.S.P. IN ADELANTO CA. 92301. A
 B.O.P. FEDERAL PRISON COMPLEX. ALL THE
 PLAINTIFFS ARE IN SEGREGATION ON
 S.H.U. DAVID CONRAD AND JAMES LEE
 ARE IN ADMINISTRATIVE SEGREGATION
 AS IT IS NOT SAFE TO THEIR WELL BEING
 TO BE RELEASED INTO POPULATION DUE
 TO COMING TO VICTORVILLE USP FROM
 "GANGFREE U.S.P.'S" OR "P.C." USPS. THEY
 WOULD BE HARMED OR KILLED AT U.S.P.
 VICTORVILLE. PLAINTIFF DEONTE SPICER
 IS IN SEGREGATION FOR PUNISHMENT
 DUE TO REFUSING AN ORDER AND OTHER
 CHARGES HE GOT AFTER BEING BEAT BY GUARDS
 IN POPULATION AND IN S.H.U. IN VICTORVILLE
 U.S.P. PLAINTIFF DAVID CONRAD ~~AND JAMES LEE~~
 BOTH TRANSFERRED TO VICTORVILLE IN
 RETALIATION FOR MAKING COMPLAINTS ABOUT
 THERE CARE. PLAINTIFFS LEE AND CONRAD
 HAVE HAD "CARE LEVEL" CHARGES AND FALSE
 RECONVO'S MADE TO GET THEM TO VICTORVILLE
 U.S.P. PLAINTIFF CONRAD HAS 19 POINTS
 AND IS A MEDIUM CARE LEVEL 3 INMATE WHO
 SHOULD NOT LEGALLY BE ON A U.S.P. LEVEL PRISON.
 IT IS NOT LEGAL TO HOUSE HIM AT THIS PRISON.

PLAINTIFF CONRAD WAS "TRANSFERRED"
TO A DIFFERENT PRISON INTO ATYPICAL HANDSHIP
AFTER GETTING A VISIT BY HIS LAWYER WHERE
LAWYER LINDA SHEFFIELD TOOK MEDICAL PERSONAL
"THEY WERE ALL BEING TAKEN TO COUNT" OVER
THE CONDITION OF DAVID CONRAD. ONE WEEK
LATER PLAINTIFF CONRAD WAS SENT WITH
19 POINTS TO ONE OF THE MOST DANGEROUS
PRISONS IN THE U.S.A. WHERE INMATES
WERE TOLD IN ADVANCE TO THE PLAINTIFF'S
CONRAD'S ARRIVAL. PLAINTIFF CONRAD WAS TO
BE ALLOWED INTO G.P. SO HE COULD BE KILLED.
PLAINTIFF JAMES LEE WAS TOLD BY THE SAME
PRISON GANG TO STAB AND KILL ANOTHER INMATE.
JAMES LEE HAS "MS" IS BLIND IN ONE EYE
AND HAS AROUND A YEAR LEFT IN HIS SENTENCE.
HE REQUESTED ADMINISTRATIVE SEGREGATION AS
HE WOULD BE KILLED IF HE DID NOT COMPLETE
THIS "MISSION"; PLAINTIFF CONRAD WAS PUT
BY STAFF AHEAD OF TIME INTO THE UNIT AND
ROOM OF THE GANG LEADER CALLING AND ORDERING
THESE HIT'S. THIS WAS NOT THE FAULT OF
CONRAD'S REGULAR "UNIT TEAM".

II. PLAINTIFF'S

3. PLAINTIFF, DAVID EARL CONRAD
REG # 18317-424 IS AND WAS AT ALL
TIMES MENTIONED HEREIN A PRISONER
OF THE F.B.O.P. FEDERAL PRISON SYSTEM
AND IS CONFINED IN VICTORVILLE
U.S.P. IN ADELANTO, CA 92301.
4. PLAINTIFF DEONTE SPICER REG # 35679-007
IS AND WAS AT ALL TIMES MENTIONED
HEREIN A PRISONER OF THE F.B.O.P.
FEDERAL PRISON SYSTEM AND IS CONFINED
IN VICTORVILLE U.S.P. IN ADELANTO,
CA 92301.
5. PLAINTIFF JAMES LEE REG # 27108-038
IS AND WAS AT ALL TIMES MENTIONED
HEREIN A PRISONER OF THE F.B.O.P.
FEDERAL PRISON SYSTEM AND IS CONFINED
IN VICTORVILLE U.S.P. IN ADELANTO,
CA 92301.

AND

FUTURE PLAINTIFFS/ALONG WITH ALL OTHER PLAINTIFF'S
ANY UNKNOWN OR UNNAMED PERSON'S BEING DENIED
MEDICAL CARE, BEING ABUSED, OR IN DEPRIVATION
OF THEIR RIGHTS IN VICTORVILLE U.S.P, ADELANTO CA. 92301

III. DEFENDANT'S

6. DEFENDANT "JANE DOE" IS A NURSE AND THE ONLY MEDICAL PERSON THAT PLAINTIFF SPICER SAW AT VICTORVILLE HOSPITAL IN CA. DEFENDANT "JANE DOE'S" NAME IS WITHHELD FROM US AS INMATE'S BUT AFTER SPICER WAS BEATEN BY GUANO'S SO BAD AS TO BE IN A WHEELCHAIR AT VICTORVILLE U.S.P. DEFENDANT JANE DOE DID NOT GET THE PLAINTIFF CARE ON A DOCTOR EVEN AS HE WAS IN EXTREME PAIN AND ALLOWED PLAINTIFF SPICER TO BE SIGHNES OUT BY GUANO'S AGAINST HIS WILL AND WITHOUT CARE. IN VIOLATION OF CA CODE 845.7 THAT SAYS OUTSIDE PROVIDERS ARE LIABLE WHEN THEY DON'T GET NEEDED CARE TO AN FEDERAL INMATE. HER NAME IS ON HOSPITAL AND MEDICAL RECORD BUT KEPT FROM THE PLAINTIFF'S. ON DATE PLAINTIFF SPICER SAW THE DEFENDANT FOR CARE AT VICTORVILLE HOSPITAL. VICTORVILLE HOSPITAL IS A LOCATION VICTORVILLE U.S.P SENDS INMATES WHO NEED EXTRA EMERGENCY CARE, THEY HAVE "TIES" TO THE FEDERAL GOVERNMENT. JANE DOE IS DEFENDANT ONE.

7. DEFENDANT F. RUTLEDGE IS THE M.D. OR DOCTOR AT VICTORVILLE U.S.P. IN ADELANTO CA. HE IS LEGALLY RESPONSIBLE FOR THE OVERALL HEALTH AND WELFARE OF THE PLAINTIFFS ALONG WITH MEDICATION. ^{DEFENDANT} #2

8. DEFENDANT D. SHINN IS THE WARDEN OF U.S.P. VICTORVILLE IN ADELANTO CA. HE IS RESPONSIBLE FOR THE DAY TO DAY OPERATION OF U.S.P. VICTORVILLE AND FOR THE WELFARE OF ALL THE INMATES AT SAIO PRISON. DEFENDANT #3.

9. DEFENDANT J. BUNSOLO IS A C.O. / U.A. OFFICER AT U.S.P. VICTORVILLE. HE IS DEFENDANT #4 ALSO AT ADELANTO CA.

10. DEFENDANT D. DEGOEY IS S.H.U. #3 OFFICER, OR A OFFICER IN S.H.U. AT U.S.P. VICTORVILLE IN ADELANTO CA. DEFENDANT #5.

11. E. VELEZ IS A "SENIOR OFFICER SPECIALIST" OR A C.O. AT U.S.P. VICTORVILLE IN ADELANTO CA. DEFENDANT #6

12. J. DOE IS THE REGIONAL DIRECTOR
AT 7338 SHORELINE DR, STOCKTON CA.
95219. WHO IS TO STOP CRUEL AND
UNUSUAL PUNISHMENT AT THIS REGION.
DEFENDANT #7


13. MORENO IS THE HEAD OFFICER IN
THE SHU OR HOLE, KNOWN AS THE
"LT," DEFENDANT #8

14. C. HERRERA IS ALSO A HEAD OFFICER
AND OR "LT" IN THE "SHU" OR "HOLE IN
CHARGE OF THE SAFETY OF INMATES AS THE
#1 OFFICER IN CHARGE. DEFENDANT #9

15. JOHN DOE #2 IS THE CLINICAL DIRECTOR OR
HEAD DOCTOR AT U.S.P. VICTORVILLE. DEFENDANT #10

16. EACH DEFENDANT IS SUED INDIVIDUALLY
AND IN HIS OR HER OFFICIAL CAPACITY.
AT ALL TIMES MENTIONED IN THIS
COMPLAINT EACH DEFENDANT WAS
ACTING UNDER THE COLOR OF ~~THE~~ LAW
AT ALL TIMES.

IV. EXHAUSTION OF LEGAL REMEDIES

17. ALL OF THE PLAINTIFFS HAVE USED THE PRISONER GRIEVANCE PROCEDURE AT VICTORVILLE AND OTHER PRISONS AND GOT NO HELP. PLAINTIFF SPICER HAS HAD HIS GRIEVANCES "LOST" BY VICTORVILLE USP. AS ONGOING PAIN AND HARM IS GOING ON NOW, AND ANY FURTHER WAIT WOULD CAUSE IRREPARABLE HARM FOR ALL OF THE PLAINTIFFS WE ASK FOR THIS COMPLAINT TO MOVE FORWARD. ALL THE PLAINTIFFS ARE ON 24hr LOCKDOWN IN THE "HOLE" ON SHU AND DO NOT HAVE COPIES OF ALL OF THEIR GRIEVANCES. SENSITIVE BP-9'S HAVE BEEN SENT TO THE REGIONAL DIRECTOR FOR HELP AS WELL WITHOUT ANY HELP GIVEN. THE PLAINTIFFS ASK THE COURT UNDER DISTRICT OF COLUMBIA, 254 F 3d 262 (2002) D.C. CIR, TO ~~AND~~ GRANT THE PLAINTIFFS INJUNCTION. PLAINTIFF CONRAO IS IN EXTREME NERVE PAIN AND GETTING FURTHER "IRREPARABLE HARMEN TOE", JAMES LEE IS NOT GETTING HIS M.S. MEDICATION AND TAKING TIME OFF HIS LIFE AS WELL AS IN PAIN, AND SPICER IS IN PAIN FROM A BROKEN ARM AS WELL AS
D.C. PAGE 9 IN DANGER FROM STAFF AT VICTORVILLE U.S.P. 

Facts of Plaintiff's Conrad, Spicer, Lee

18. Plaintiff David Earl Conrad was shot in 2005 with a 12 Gauge shot gun in the left leg. This caused plaintiff Conrad to almost lose his life. Conrad had to be medi-vac by helicopter to Loyola hospital and trauma center in Chicago where multiple surgery's had to be done for days to save plaintiff Conrad's life and leg.

19. Due to being shot Conrad lost his left calf muscle, The main artery in his left leg from knee to foot and had extensive nerve damage a vein graft from Conrad's right leg had to be taken from crotch to ankles even after the best surgery's in the city of Chicago's trauma unit at Loyola Put ~~Chicago's~~ Conrad back together. He was never expected to walk again as the damage to nerves and his leg were severe. No less then two times did doctor's try to get Conrad to cut off the leg after the complicated surgery's all on record.

20. Through never ending physical therapy, treatment for chronic constant and debilitating pain and constant care by no less then 5 doctor's Conrad was able to walk unassisted within one year "a miracle" claimed by doctor's.

21. In the 7 years Conrad has been in the federal Bureau Prison's the medical staff have turned him back into a cripple. Being denied proper medication's for month's, then given them back only to have medical staff make any attempt in retaliation to remove him from medication's ordered by there own B.O.P. doctor's outside expert's and doctor's from pain management Conrad's condition has on record due to neglect, abuse, and lack of care

and ~~retaliation~~ worsened to the point where the plaintiff will lose his ~~foot~~ and toes soon and his ability to walk. All due to lack of care and retaliation that is nothing less than assault and battery. If the care Conrad was given was not in the B.O.P. but at a nursing home or hospital people would go to. JAIL.

22. At Victorville U.S.P. ^{U.S.P.} a ~~person~~ prison Conrad who has 19 Points (Medium Security) Points isn't even allowed to be at his condition is horrible.

23. Conrad who suffers from chronic pain, diabetic nerve pain requiring a specific medication or Conrad is in tortures pain, as well as "hammer toe" where his paralyzed toes are pulling down ripping the tendons in his foot, muscle's wasting, complex regional pain dystrophy, arthritis, bullets still stuck and bruises on feet, depression and anxiety and more recently caused by pain and lack of care and med's high blood pressure and migraine headaches Conrad's in need of care only a medical prison hospital can provide.

24. In Victorville U.S.P. Conrad is and for around 2 weeks getting no medication at all Conrad has been off all his region and outside doctor ordered medication since July 2016 in Victorville U.S.P. even after seeing doctor Rutledge 2 weeks ago on ~~wednesday~~ Wednesday 1, of Feb. 2016.

25. Conrad has turned to the "nurse" along with Dr. Rutledge and the warden of U.S.P. Victorville "countless" sick calls, BP-8, personal letters and notes and verbally asked for help. After writing a letter To DR. RUTLEDGE

to Dr. Rutledge that Conrad sent from his cell in S.H.V. saying he was being denied his chronic care 30 day visit that must be done Dr. Rutledge did an exam on Feb. 1, 2017.

26. At that time Dr. Rutledge saw in B.O.P. files the serious medical issues the plaintiff suffered from physical and mental. Those records show plaintiff Conrad is normally on in B.O.P. custody Lyrica 300 mg 2 times a day and ~~or~~ or atwza time relief morphine, chronic pain med's Lyrica med's are not and optional medication and must be taken by Conrad daily for life or he suffers extreme constant pains and needles in his leg and foot causing traumatic pain and lack of sleep due to pain. Along with Conrad's psych history of anxiety and depression.

27. At that exam with doctor Rutledge plaintiff Conrad begged for his Lyrica medication to be turned on as he was in great pain. Dr. Rutledge saw the plaintiff had a very serious medical need and was deliberate in different to his need by getting Conrad no care or med's. sooner or later, or maybe never Dr. Rutledge said he put in "requests for the plaintiff med's." The plaintiff had high blood pressure due to horrible pain and was sweating doing nothing was a wanton infliction of pain.

28. Lack of these medication's are causing pain and tendon's and toe's to curve and spasm into a contorted position that can not be undone or fixed causing further harm daily.

29. The day the plaintiff saw the doctor defendant Rutledge, all his psych medication's "expired" also for two week's no med's of any kind have been given to the plaintiff in S.H.V. And none comes

30. Dr. Rutledge saw that not only does Conrad have medical problems but anxiety and depression. On Veterans day 2016 the plaintiff swallowed razor blades to get to a hospital so he could get meds and care as he was suffering without his Lyrica medication (a medication he's been on since 2005) and in ~~severe~~ pain. Since being denied his Lyrica medication Conrad has had to be removed from his room throwing up, unable to walk in a wheel chair to be given "shots" to stop nausea, and a shot that does nothing for pain. After going through one of these incidents Conrad tried to send himself on a hospital trip by swallowing razors in front of the staff. In that incident in Tucson U.S.P. Conrad was given no help, was left with razor blades in his body, and was not given his medication even after Dr. OE Guzman prescribed on record Conrad's nerve damage meds again he was still blocked of care. All this is in records that Dr. Rutledge read in front of Conrad after this exam knowing Conrad was in need of serious care and had been denied care for some months already. Dr. Rutledge got him no help and even allowed his psych meds to expire.

31. An inmate must rely on prison authorities to treat his medical needs if the authorities fail to do so those needs will not be met (*Estelle v. Gamble*, 429 U.S. 97, 103, (1976)) Conrad's eighth amendment right to medical care has been violated by Dr. Rutledge, defendant #2, he has been shown deliberate indifference by Dr. Rutledge and warden D. Shinn. Conrad's medical needs have been diagnosed by no less than 20 doctors all in B.O.P. electronic records Conrad has many chronic conditions that are real and cause him danger and harm, without care Conrad is crippled and is caused further unrepairable harm. Even a layman can see these conditions need treatment. Conrad has written to file on and shown warden D. Shinn and Dr. Rutledge his condition. Prison officials and doctors do nothing.

UNTILL THERE IS A COMPLAINT IN COURT AND THEN LATER RETALIATE FOR MAKING COMPLAINTS BY FAULSEFYING RECORDS, AND SENDING THE PLAINTIFF TO A VEAANY DANGEROUS PRISON THAT REQUIRE'S 24 POINTS AND UP TO BE AN INMATE AT CONRAD HAS 19 ALONG WITH BEING DENIES THE "KEY" MEDICATION AND CAUSING THE PLAINTIFF CHRONIC PAIN, HIGH BLOOD PRESURE, AND WEIGHT LOSS (ALL IN B.O.P. ELECTRONIC RECORD) THE PLAINTIFF IS CAUSED PAIN AND HARM AND DISTRESS BY JOHN DOE #1 THE HEAD OF THE REGION FOR BLOCKING DOCTOR'S REPEATED REQUESTS FOR LYRICA AND PAIN MEDICATION, PLACEMENT AT A MEDICAL PRISON FOR CARE AND TREATMENT. ALSO THE REGIONAL DIRECTOR DOES NOT GET HELP TO OR ANSWER "SENSITIVE" REQUESTS FROM THE PLAINTIFF. DR. RUTLEDGE IS LIABLE AS AFTER HIS ORDERS ARE BLOCKED BY "NON MEDICAL PERSONAL" HE DOES NOT CONTINUE TO GET THE PLAINTIFF CONRAD ON ANY OF THE PLAINTIFF'S HELP OR CARE. D. SHINN ALLOW'S THE MISTREATMENT OF MEDICAL INMATES AND CAUSE'S THE PLAINTIFF HARM EVERYDAY HE'S LEFT WITHOUT CARE

32. MEDICAL CARE IS SO BAD AT VICTORVILLE USP THAT THE PLAINTIFF IS FORCED TO WEAR A PAPER JUMPSUIT THAT CAUSE'S RASH'S AND WORSE'S THE PLAINTIFF'S KNOWN SKIN DISORDERS OR GO NUDE, TO SLEEP WITH BLANKETS THAT CAUSE RASH'S OR GO COLD AND GO WITHOUT SHAMPOO AND TREATMENT FOR DERMATITIS FOR WEEKS DUE TO DELAYS IN CARE. PAGE 14^{DC}

33. WARDEN D. SHINN ALLOWED CONRAD TO BE PLACED TO BE PUT IN GENERAL POPULATION WITH THE HEAD WHITE INDEPENDANT GANG LEADER IN THE F.B.O.P AS HIS CELLMATE IN UNIT A-2. WARDEN D. SHINN KNOWS AN INMATE COMING FROM A "PC" ON GANG FREE PRISON ALONE IS NOT SAFE TO GO INTO GENERAL POPULATION AT VILTONVILLE, ON TOP OF THAT THE CHARGES THAT CONRAD ARE IN PRISON FOR WOULD GET HIM KILLED AT VILTONVILLE AS WELL. EVEN IN THE HOLE IN PROTECTIVE CUSTODY INMATES HAVE TRYED TO CAUSE CONRAD HARM AS CONRAD IS ON A LIST OF PEOPLE TO "HIT" ON "IN THE HAT". GANG MEMBERS HAVE TRYED TO GET CONRAD'S 39 POINT EX GANG MEMBER ROOMATE TO CAUSE HIM HARM BUT WERE SO FAR UNABLE TO SUCCEED. WARDEN SHINN THEN CAUSES THE PLAINTIFF TO GET "SHOT'S" AND LOSE "GOOD TIME" FOR NOT GOING INTO POPULATION TO BE KILLED OR BEATEN AT A PRISON HE ISNT LEGALLY ABLE TO BE AT WITH 19 POINTS.

34. WARDEN D. SHINN DOES NOT GIVE THE PLAINTIFF HIS LEGAL WORK SO HE CAN NOT FIGHT HIS ACTIVE CALIFORNIA CIVIL CASE (NO CV 15-04537-MWF (DTB) AND HELP'S THE GOVERNMENT GET SUMMARY JUDGEMENT AS CONRAD CAN NOT PUT ON ANY DEFENCE. CONRAD IS BEING DENIED MEDICAL CARE ORDERED BY MULTIPLE B.O.P. DOCTORS, FORCING HIM TO STAY IN SHU IN UNFIT CONDITIONS, TAKING HIS GOOD TIME AND ALLOWING THE PLAINTIFF TO BE IN UNSAFE CONDITIONS AS HE WAS NOT ONLY PAGE 15

going to be put in population with U.S.P. inmates who are "active" but into the #1 white gang leader's unit and room who knew the plaintiff was coming Conrad was put in perfect place to be harmed or more likely killed as this inmate orders "hits", the last "hit" involve killing and trying to cut off the head of a regular active inmate in population Victorville U.S.P. is one of the most violent U.S.P.'s in the U.S.A. Conrad has F.C.I. points.

35. plaintiff lee was also forced in protective custody due to the fact that when this white gang leader found out he came from a "PC" prison he was told to stab and kill another inmate or be killed himself plaintiff Lee has M.S. and is blind in one eye. He should of not been sent to U.S.P. Victorville or allowed into population.

36. If Dr. Rutledge did not have enough information to guarantee pain and harm would come to plaintiff Conrad VIA all his past records, his exam and outside medical expert's if not given immediate care (a showing of causation without argument) he was also informed by the plaintiff that in civil case CV 15-04537-MWF (OTB) David Conrad V. ~~RODRIGUEZ~~ ~~RODRIGUEZ~~, Hon David T. Bristow Judge on said case allowed Conrad to sue the C.D. Medical doctor at Lompoc U.S.P. for "excessive use of force" in the same California District when Conrad was denied care and med's. for 12 ~~days~~ ~~days~~. Conrad had at that point been denied care and med's. or exam for five week's at Victorville by doctor Rutledge Conrad still has this other case active and is struggling with it due to lack of contact with payed lawyers unable to help, retaliation by prison officials taking his paperwork, not allowing him the medical records to fight summary judgement, transfers, and his overall medical condition in this case at Victorville he has broken no rules, never miss used his medication, never got a shot or charge for miss use of his medication. He is just left to suffer in a malicious and sadistic use

of excessive force.

37. Warden D. Shinn knew that there was a "substantial risk" I would be harmed at this prison and has failed to protect the plaintiff from physical brutality as well as cruel and unusual medical care.

38. In Conrad's medical records it also shows that after swallowing razor blades he was sexually assaulted by a guard ~~at~~ a Tucson U.S.P. a formal complaint was made V.I.A. S.I.A. and O.I.G. and the assault was witnessed by six S.H.U. C.O.'s Conrad was assaulted when after being visibly ill and in pain on the floor of his cell he swallowed razor blades to get to a hospital in risk of his life. The #1 S.H.U. officer (who had been beaten at another prison for assaulting inmates) forced the plaintiff's cloth's off, stuck his gloved fingers inside the plaintiff's rectum "looking for the razor" and then forced that same finger into the plaintiff's mouth two times the plaintiff was then given a "wedge" by this same officer and told to "shut up or I'll bitch slap you" all in front of other guards who had to stop the assault from continuing. Dr. Rutledge knows the plaintiff has been abused and is suffering anxiety and let Conrad ~~go~~ go without meds.

39. All the plaintiff's suffered from inhumane treatment and care by staff, nurses and doctors at U.S.P. Victorville Conrad has been given the wrong person's pill line medication two times in a month. Lee and Spicer have been denied there medication for M.S., Pain, and psych issues twice in a month as "it was late and the nurse doesn't get overtime"... filing a complaint on staff who have beaten, neglected or abused inmates at Victorville would require lawyer's and a month of writing. That very well may come in the future, other ~~named~~ named inmates have been beaten to death by guards relentlessly in the S.H.U. in Victorville, Been denied care, water,

being maced without real reason, all sorts of human rights violations inmates who try by "force" or by refusing guard's orders in S.H.V. to get help are beaten bloody by S.H.V. staff and denied care. A guard who beat an inmate to death killed himself a short time ago in Victorville's staff parking lot to avoid prison. The staff at Victorville are under investigation by F.B.I. and other authorities doctors cover up injuries and file false reports. All the inmates at this prison are in danger due to it's Supervisors.

40. For 14 Day's IN THE HOLE THE PLAINTIFF GOT NO MEDICATION, PAIN ON PSYCH MED'S. MEDICATION THAT IN THE DIRECTOR'S STATE "DO NOT JUST STOP TAKING THIS MEDICATION OR THERE IS A HIGH RISK OF SUICIDE OR COMPLICATIONS" FOR 8 WEEKS IN SHV THE PLAINTIFF HAS NOT GOT HIS NERVE DAMAGE MEDICATION AND HAS BEEN IN CONSTANT CHRONIC PAIN. CONRAD HAS SHOWN MEDICAL STAFF DARK BRUISES ON HIS FEET DUE TO POOR BLOOD FLOW CAUSING CONSTANT PINS + NEEDLES AND SORES ON TOES AND BEEN GIVEN PSYCH MED'S AND OVER THE COUNTER IBUPROFEN. THIS IS NOT THE STANDARD OF CARE FOR SOMEONE IN THE PLAINTIFF'S MEDICAL CONDITION. REGIN IS AWAKE, WANDER SHINN HAS SEEN WITH HIS OWN EYES AND IS AWAKE, AND DR. RUTLEDGE IS AWAKE BUT CONRAD IS STILL DENIED CARE. ALONG AS PLACEMENT AT A SAFE MEDICAL PRISON LIKE BUTNER OR ROCHESTER MIN. THE PLAINTIFF IS IN GRAVE DANGER AT VICTORVILLE VSP MEDICALLY AND IN DANGER OF HIS LIFE.

41. ON FEB-1ST 2017 AFTER A MONTH WITHOUT MEDICATION FOR NERVE DAMAGE SINCE SEEING DR RUTLEDGE (DEFENDANT #2) CONRAD IS TOLD BY A RANDOM NURSE HIS NERVE DAMAGE MEDICATION, THE SAME MEDICATION HE'S BEEN ON MORE OR LESS SINCE 2005 IS AGAIN DENIED BY JOHN DOE #2 THE CLINICAL DIRECTOR OF VICTORVILLE U.S.P. THIS NON NARCOTIC MEDICATION THAT COUNTLESS B.O.P. DOCTOR'S SUBSCRIBER (ONE BEING DR. RUTLEDGE) IS DENIED AGAIN IN RETALIATION BY JOHN DOE #2 WITHOUT SEEING CONRAD OR DOING ANY EXAM. NO OTHER HELP IS OFFERED AND THE PLAINTIFF IS LEFT WITH NO MEDICATION FOR BY FAR ONE OF THE B.O.P.'S MOST EFFECTED INMATE'S WHO HAS NERVE DAMAGE. INTERFERING WITH CONRAD'S TREATMENT ORDER IS A WANTON INFLECTION OF PAIN. NOT DOING ANYTHING ELSE OR DOING AN EXAM IS DELIBERATE INDIFFERENCE. LEAVING THE PLAINTIFF TO HOPE FOR MONTHS THAT HIS DEBILITATING PAIN WOULD BE OVER THEN LEAVE HIM IN THAT STATE ~~IS~~ EXCESSIVE USE OF FORCE AND TORTURIZING AS CONRAD HAS STATED HE IS IN SUCH PAIN HE FEARS BEING WITHOUT LYRILA MEDICATION DUE TO THE PAIN. LYRILA OR GABAPENT ARE THE ONLY MEDICATIONS FOR HIS PAIN THAT WORK A

42. ON FEB - 1ST 2017 CONRAD WAS CHARGED AND LOST 14 GOOD DAYS AT A HEARING BY D.H.U. THAT WAS DONE AROUND OTHER INMATE'S FOR REFUSING TO GO TO GENERAL POPULATION AT A PRISON HE CAN NOT BE AT WITH 19 POINTS, ON WALK WITH OTHER INMATE'S WITHOUT BEING BEATEN OR KILLED. WARDEN D. SHINN HAS ALLOWED CONRAD TO BE ABUSED MEDICALLY AND TO LOSE GOOD TIME AND STAY IN PRISON FOR TWO EXTRA WEEKS FOR BEING WRONGLY SENT TO HIS PRISON WITHOUT CAUSE.

43. ON FEB - 1ST 2017 CONRAD IS STILL DENIED HIS PROPERTY AND LEGAL WORK EVEN WITH AN ACTIVE CIVIL CASE WHILE CONRAD HAS BEEN AT VILTONVILLE FOR 70+ DAYS.

44. ALL OF THESE ARE FACTS SUPPORTED BY ELECTRONIC RECORD AND PAPERWORK IN B.O.P FILES. FACTFINDING BY AN LAWYER FIGHTING FOR PLAINTIFF CONRAD WOULD SHOW THESE FACTS TRUE AND CORRECT.

45. THIS COMPLAINT HAS BEEN WRITTEN WITH NO LEGAL HELP BY AN INMATE WITH A FLEXIBLE PEN IN SH.U. WITH NO COPIES OR TYPEWRITEN OR HELP FROM UNIT TEAM. PAGE 20

46. AS OF MARCH 27 2017 PLAINTIFF CONRAD HAS SPENT 210+ DAYS IN 24 HOUR LOCKDOWN STRAIGHT. AS WELL AS NOT BEING GIVEN HIS MEDICATION THIS ENTIRE TIME AS WELL. THE EXTRA HARSH CONDITION IS CAUSING HARM TO DAVID CONRAD AND IS AN ONGOING VIOLATION.

47. IN MEDICAL RECORDS J.DOE #1, J.DOE #2, AND DR RUTLEDGE USE FAKE OR MADE UP REASONS TO NOT GIVE CONRAD CARE SUCH AS CONRAD DOESN'T TAKE HIS MEDICATION OR "CHEEK'S" PILLS. CONRAD HAS NOT BEEN CHARGED BY INCIDENT REPORT, BEEN REMOVED FROM OTHER MEDICATIONS OR DONE ANY WRONG DOING WITH HIS MEDICATIONS. CONRAD WAS SAID TO HAVE TRIED TO "SAVE" MEDICATION IN LOMPOC IN 2014 BY A NURSE WHO LIED TO CAUSE HARM. THIS NURSE WAS ON CAMERA AND SHOWED TO BE MAKING THINGS UP AND CONRAD'S MEDICATION WAS RESTORED. NOT SINCE THEN HAS THE PLAINTIFF EVER MISUSED MEDICATION. EVEN WITH THIS "BLACK MARK" ON HIS RECORD DOCTORS STILL ORDER HIS MUCH NEEDED MEDICATION BUT THE DEFENDANTS J.DOE #1, J.DOE #2 BLOCK DOCTORS ORDERS TO CAUSE KNOWN PAIN AND DAMAGE TO CONRAD.

D.C.

FACTS OF PLAINTIFF JAMES LEE

48. IN OCTOBER OF 2007 PLAINTIFF LEE WAS DIAGNOSED WITH MULTIPLE SCLEROSIS OR "M.S." AFTER MONTHS OF EXTENSIVE M.R.I.'S AND "LUMBAR PUNCTURES". PLAINTIFF LEE'S PRIMARY DOCTOR SENT HIM TO SEE DR. BHARATI PADAMANABAN, A NEUROLOGIST AT WIDDEN MEMORIAL HOSPITAL IN EVERETT, MASSACHUSETTS. HE BECAME THE PLAINTIFF'S PRIMARY NEUROLOGIST AND STARTED TO TREAT AND DIAGNOSE THE PLAINTIFF'S SERIOUS HEALTH ISSUES. FIRST WAS "FACE PAIN" OR "TRIGEMINAL NEURALGIA" AND ALSO THE LOSS OF VISION IN THE PLAINTIFF'S LEFT EYE AS "OPTICAL NEURITIS". THESE FINDINGS WERE BACKED UP BY MISHA PLESS, M.D. WITH A SECOND OPINION. ALL THIS IS ON RECORD WITH THE B.O.P. IN ELECTRONIC RECORDS.

49. AFTER MANY TRIALS OF MEDICATIONS AND M.S. TREATMENT PLANS THE DOCTORS GAVE THE PLAINTIFF A MEDICATION COPAXONE A SELF INJECTING M.S. TREATMENT.

50. DUE TO THE PLAINTIFF'S IMMOBILITY AND STAGNANT STATE AS HIS BODY ADJUSTED TO THE COPAXONE MEDICATION, THE PLAINTIFF DEVELOPED TWO SEPERATE BLOOD CLOT'S. ONE IN THE PLAINTIFF'S RIGHT LEG AND ONE IN THE PLAINTIFF'S LEFT CALF ROUGHLY 6 MONTHS APART. DUE TO THESE BLOOD CLOT'S THE PLAINTIFF WAS PUT ON WARFFERIN AND LOUINOX BLOOD THINNING MEDICATION'S. THE PLAINTIFF BECAME ANEMIC AND WAS GIVEN MORE MEDICATION TO TRY TO RESTORE THE PLAINTIFF'S ENERGY. WHEN THE PLAINTIFF WAS PLACED IN PRISON HE HAD A "LAUNDRY LIST" OF AILMENT'S AND MEDICATION'S.

51. "M.S.", TRIGEMINAL NEURALGIA, "D.V.T" ON DEEP VAIN THROMBOSIS, OPTIC NEURITIS, ANXIETY OF DEALING WITH M.S. WERE JUST SOME OF THE SERIOUS MEDICAL ISSUES THE B.O.P. IS AWARE OF.

52. DEFENDANT F. RUTLEDGE IS THE M.D. WHO NOW TAKE'S CARE OF THE PLAINTIFF AT VICTORVILLE U.S. AND HAS THE PLAINTIFF'S MEDICAL RECORD'S FROM MULTIPLE DIFFERENT B.O.P. PRISON'S THE PLAINTIFF HAD BEEN LOCATED AT WHILE IN CUSTODY. SEE EXHIBIT-A IN HIS OWN WORDS WRITTEN BY MR. JAMES LEE.

53. WHILE DR F. RUTLEDGE MAY NOT BE AT FAULT FOR THE YEARS OF NEGLECT AND LACK OF CARE THAT HAS IN FACT TAKEN YEARS OF TIME OFF THE PLAINTIFF'S LIFESPAN, HE IS IN CHARGE OF HIS PLACEMENT ("CARE LEVEL"), MEDICATIONS, AND TREATMENT NOW. AS WELL AS LIABLE FOR THE FUTURE TIME OF LIFE LOST FOR NOT BEING "TREATED FOR HIS M.S.," AND OTHER SERIOUS MEDICAL PROBLEMS. AS IS WARDEN D. SHINN FOR HE KNOWS VIA CO-OUTS, VERBAL COMPLAINTS, AND PRISON REMINDERS THAT THE PLAINTIFF IS, NO. 1 NOT GETTING HIS M.S. MEDICATION, NO. 2 NOT SAFE AT U.S.P. VILTONVILLE (THE PLAINTIFF IS IN P.C. OR PROTECTED CUSTODY IN SH.V.). NO. 3 NOT HOUSED AT A REAL PRISON "CARE LEVEL 3" OR PRISON HOSPITAL AS HE SHOULD BE. THE B.O.P., M.D. RUTLEDGE AND WARDEN D. SHINN ARE CAUSING THE PLAINTIFF PAIN, HARM THAT CANT BE UNDONE, EMOTIONAL DISTRESS AND A WANTON INFLECTION OF PAIN, KEEPING HIM HELD IN CRUEL AND UNUSUAL CONDITIONS HOLDING HIM WITH NO TREATMENT FOR HIS KNOWN "M.S." OR MEDICATION FOR HIS M.S. THIS IS DELIBERATE INDIFFERENCE.

54. DR RUTLEDGE IS NOT GETTING THE PLAINTIFF THE MEDICATIONS FOR M.S., PAIN, AND PSYCH ISSUES THAT HAS BEEN ORDERED BY MEDICAL PROFESSIONALS OR RECO-PAD D.C.

55. CAUSING SOMEONE TO DIE BEFORE THEIR TIME IS EXCESSIVE WHEN TREATMENT AND MEDICATION IS KNOWN TO STOP THE PLAINTIFF'S M.S. FROM BEING PROGRESSIVELY WORSE.
56. BEFORE COMING TO PRISON THE PLAINTIFF WAS PRESCRIBED BY MEDICAL EXPERTS TRAMADOL, BACLOFENE, GABAPENTIN, COBAXONE (FOR THE M.S.), XANAX, CITRULAPAM, DOXADIN FOR THE ANXIETY AND DEPRESSION OF DEALING WITH THE M.S. ALONG WITH OTHER PAIN MANAGEMENT MEDICATION SUCH AS ZOMG OXY 2 TO 3 TIMES A DAY.
57. THE PLAINTIFF WAS ON ADDERALL FOR HIS FEELINGS OF TIREDNESS DUE TO THE FACT OF BEING DIAGNOSED ANEEMIC.
58. THE ONLY MEDICATIONS PLAINTIFF JAMES LEE HAS BEEN ON THE ENTIRE TIME IN THE TIME HE'S BEEN IN THE B.O.P IS GABAPENTIN AND BACLOFEN AS FAR AS WORKING MEDICATIONS THAT HELP HIM FROM SUFFERING
59. AT THIS TIME DR. F. RUTLEDGE ONLY ALLOWS THE PLAINTIFF TO GET BACLOFEN AS THE ONLY WORKING MEDICATION. HE IS GIVEN NO MEDS OR TREATMENT FOR THE M.S. AS WELL AS DENIES THE PLAINTIFF'S GABAPENTIN AND PAIN MEDS.
- D.C.

60. PLAINTIFF LEE HAS BEEN SENT OUT TO HOSPITALS OVER HIS EIGHT YEARS IN F.B.O.P. CUSTODY, TO SEE NEUROLOGISTS, IN KENTUCKY, FLORIDA, INDIANA AND VERIFYING HIS CONDITIONS AND THAT HE HAS M.S. THERE IS NO WAY TO SAY DR. RUTLEDGE OR WARDEN D. SHINN ARE NOT "AWARE" OF THE PLAINTIFF'S MEDICAL ISSUES.

61. PLAINTIFF LEE HAS FILLED OUT MORE THEN 15 SICK CALLS REQUESTING HELP. HE HAS NEVER BEEN EXAMINED BY A DOCTOR IN FULL IN VIOLATION OF HIS 30 DAY MANDATORY CHRONIC CARE APPOINTMENT BY B.O.P. POLICY. HE HAS NOT RECEIVED CARE IN THE MONTHS THAT HE'S BEEN AT VILTONVILLE U.S.P. THE WARDEN DEFENDANT SHINN IGNORES THE PLAINTIFF'S REQUESTS FOR CARE. THE PLAINTIFF GETS ZERO MEDICATION FOR HIS PSYCH ISSUES WHILE HE STRUGGLES WITH M.S. AS DID J. DOE #2

62. PLAINTIFF LEE HAS WRITTEN TO THE DIRECTOR OF THE REGION WITHOUT GETTING HELP, IN FACT REGION DENIED PLAINTIFF LEE'S MEDICATION. DEFENDANT J. DOE #1.

63. WARDEN D. SHIN ALSO LET PLAINTIFF LEE INTO POPULATION AT VICTORVILLE U.S.P. WHERE HE WAS TOLD TO KILL ANOTHER INMATE OR BE KILLED HIMSELF DUE TO THE FACT HE LIKE CONRAD CAME FROM A "PC" OR "GANG FREE" PRISON. WARDEN D. SHIN WAS INDIFFERENT TO LEE'S SAFETY OR DID NOT SCREEN INMATES AND ALLOWED A HALF BLIND MAN WITH M.S. TO GO INTO POPULATION WITH ACTIVE GANG MEMBERS TO BE UNDER A VERY SERIOUS RISK OF BEING HARMED OR KILLED.

64. EVEN AFTER SEEING DR. RUTLEDGE JUST DAYS AGO HE IS STILL DENIED HIS M.S. MEDICATION BY VICTORVILLE AND THE HEAD OF THE REGION IN STOCKTON CA J.DOE. DEFENDANT #7

65. DEFENDANT D. SHIN HAD THE PLAINTIFF AT THE WRONG CARE LEVEL. M.S. WOULD NORMALLY BE A "CARE LEVEL 3" OR F.M.C. PRISON MEDICAL CENTER. D. SHIN, J.DOE #1, J.DOE #2 SET THESE CARE LEVELS IN ELECTRONIC RECORDS AND ARE CAUSING PLAINTIFF HIGH RISK OF HARM, PAIN.

FACTS OF DEONTE SPICER

66. On Sept. 15, 2016, Officer J. Bunsold and other "Compound" officers came into the unit 3-A at Victorville and started picking out people (inmates) to submit to breathalyzer test for alcohol. Deonte Spicer was picked out.

67. At that time Deonté (plaintiff) complied twice following the officers J. Bunsold order to breath into the breathalyzer and without being aggressive told officer's to just give him the "charge" on a write up at that time officer J. Bunsold got verbally aggressive and the rest of the officer's moved in a little closer that's when the plaintiff took a few steps back as Victorville C.O.'s have been known to use excessive force often.

68. On camera the plaintiff was maced in the face at that time without warning as the plaintiff was chemically blind turned around with his hands behind his back to be cuffed stepping out the cell slowly officer J. Bunsold grabbed my wrist and twisted it and him and the five other officer's started punching, kicking me then slammed me to the ground and punched and kicked me all over my body including my testicles officer J. Bunsold told the "plaintiff" next time do what I tell you dumb jig.

69. The plaintiff put in leg restraints and taken off camera were he was beaten off camera and called "nigger" and "faggot" so badly beaten he had to be taken out of the prison to a local hospital Victorvally.

This excessive use of force was so severe that a wheel chair had

to be brought to get him to the hospital as the plaintiff could no longer walk the plaintiff urinated blood for the following 3 days after the incident.

70. The plaintiff was taken to the hospital and seen by a "Jane Doe" Defendant # Jane Doe provided almost no care what so ever only putting some antibacterial cream on the plaintiff cuts and bruises only when the plaintiff said he was in very bad pain she did nothing to get a beaten man a doctor or knowing and seeing the plaintiff was possibly hurt internally due to the plaintiff telling her his lower insides hurt the nurse allowed the plaintiff to be signed out by guards who's co-workers beat the plaintiff without seeing a doctor or examining in violation of California Code 845.7 that makes a free world outside doctor personally liable for the care of an inmate if that inmate is in need of care and is left without it no one knew how bad the plaintiff was hurt one to this violation the plaintiff went back to the prison untreated by anyone. Also this was the hospital Victorville U.S.P. had a contract and "ties" with this hospital was still at all times holding the plaintiff as a prisoner at all times for the federal government, Victor Valley hospital is also a state, city, and county run hospital under California code 845.7 the plaintiff believes they are liable.

71. The plaintiff was hand cuffed and leg shackles since he was sprayed with mace and in a wheel chair. Clearly there was no need for more force on camera this whole first incident took place then off camera on the way to medical he was beaten further with such force he was bleeding internally. A maced man in a wheel chair beaten can't look to the guards to be of any threat clearly the guard's used more force then was necessary. We will

never know "how bad" the plaintiff was hurt enough to go to ~~the~~ hospital where he got no care, again on record and back to the prison where he got no further care from medical personnel, in violation to his right to be free from cruel and unusual punishment, equal protection, rights to medical care J. Bunsold led this malicious and Sadistic assault. This assault caused pain, harm, and emotional distress that continues to spin out of control at U.S.P. Victorville in Victorville CA.

72. On Nov. 17, 2016. C.O. D. DeGoey twisted the plaintiff's wrist violently causing the plaintiff to cry out in pain and pull his arms away. The plaintiff was handcuffed and in pain and pulled his arms away. Also in full compliance up until D. DeGoey purposely attempted to injure the plaintiff at his cell door that he was locked behind in S.H.V. in "the hole".

73. At that time the plaintiff again went to allow D. DeGoey to cuff him but was removed from his room instead for "moving his hands".

74. The plaintiff then had all his property taken along with legal work, toilet paper, Hygiene, and spoon, toothbrush and left like that for a week. He was forced to use the bathroom without paper or soap and eat with his hands that was unclean. He was given further "S.H.V. time" and left in unfit conditions.

75. C.O. D. DeGoey used excessive force to cause the plaintiff a wanton infliction of pain. Along with further stress and further psychological harm as he lacked things of "basic human needs". The plaintiff spoke in S.H.V. to warden D. Shinn and was still left in this state of a week he further spoke to medical on walk through days of his living conditions and his lack U.C.

of care at Victor Valley hospital.

76. C.O. D. DeGeoy continued a "Campaign of harassment" with warden D. Shinn's knowledge while still being denied medical care by plaintiff doctor M.D. Rutledge.

77. On Nov. 28, 2016 the plaintiff was tired of his human rights being violated and stuck his right arm out of the food slot of the cell door and asked for a Supervisor officer to try and get medical and mental health help. C.O. E. Velez and C.O. OIC Moreno grabbed the plaintiff's right arm in the food slot of his door and bent it as the plaintiff cried out for help until his arm broke again the plaintiff was denied the care he needed for two weeks and a X-ray two weeks later showed the plaintiff's arm did have a broken bone, and a damaged rotator in his shoulder. The plaintiff was caused harm by officer E. Velez and OIC Moreno and was lefted in clear pain and injury's in his cell denied any care by D.R. Rutledge while being in harm's way for permanent injury's. The plaintiff's shoulder is still damaged with burning and throbbing pain to this day with no care but IBuprofen. The Bone is sticking up ever to a layman.

78. On Dec. 1, 2016 the same C.O.'s who have been causing the plaintiff harm for no reason, on camera emptied two cans of mace in the plaintiff's cell and left him and his cellmate for over a week in a contaminated cell. Caused the whole STH or hole to be coughing let alone the plaintiff and his cellmate. Forced to live with mace for a week which has caused the plaintiff a breathing problem and migraine headaches. The plaintiff was forced to eat in this contaminated cell in cruel and unusual conditions or charge was given to explain why the plaintiff was maced in violation to his due process.

79. Plaintiff Spicer has been held in cruel and unusual conditions, been beaten and had excessive use of force used on him on three different dates, been ~~beaten~~ denied medical care after being beaten by prison guards and hospital staff (Jane Doe) and doctor Rutledge had his administrative remedies and mail taken, delayed, or destroyed, he's been shone in different care by Dr. Rutledge and warden D. Shinn and left for weeks with a broken arm while being maced with said broken arm by guards, outrageous and constitutional conduct warden D. Shinn is to be "notified" by staff and must authorize use of force on inmates before force can be used by guards he is liable for his role that is active, and as his role as a Supervisor Officer J. Bunsold, D. Degeoy, E. Velez, and C.O. Moreno have illegally beat plaintiff Spicer, and caused ~~beaten~~ him permanent injury and emotional distress the warden D. Shinn allows inmates to be beaten and killed whenever the guards wish and block inmate Spicer's requests to make complaints, complaints has been filed with O.I.G. and A.L.L.V. VIA Mail.

80. PLAINTIFF SPICER HAS WRITTEN "SENSITIVE BP-9"s TO THE REGION AND REGIONAL MEDICAL DIRECTOR TO GET CARE AND TO TRY AND COMPLAIN ABOUT DEFENDANT'S BUNSOLD, DEGOEY, AND VELEZ BEATING HIM. HE HAS BEEN LEFT IN PAIN BY THE PEOPLE WHO ARE THE "WATCHERS" OVER PRISON'S FOR WRONG DOING BY PRISON OFFICIALS. THEREFORE FOR BEING DENIED MEDICAL HELP BY A REGIONAL DIRECTOR (AS DIRECTORS AT VILTONVILLE U.S.P. GIVE NO HELP) AND BEING DENIED HELP BY THE REGIONAL DIRECTOR SPICER BRINGS CLAIMS OF WANTON INFLECTION OF PAIN, EXCESSIVE FORCE, DUE PROCESS VIOLATIONS ON DEFENDANT J. DOE #1. THE HEAD OF THIS REGION. ^{D.L.} PAGE 32

81. Warden D. Shinn does not get to claim qualified immunity in this case as he is not only personally responsible for plaintiff Spicer's rights being violated but speaks to the plaintiff every Wednesday about his violations in person. Dr. Rutledge and Warden D. Shinn violate in consent with each other rights of inmates that are "clearly established" if the warden is notified that a "use of force may be necessary" and he OK's it, the guards get "fired up" and go to fan and beat or kill an inmate. It's the warden's fault for allowing his staff to act in such a way or go past his orders if staff is told to just beat the inmates and they don't contact the warden for permission as they are required. Then the warden is responsible as well for allowing them to do beatings and use force on their own authority and is responsible for getting staff and doctors to sweep it under the rug. Is the warden not told by inmates and staff about guards' violent behavior? Of course he knows, the F.B.I. just indicted some of his guards also supervisory liability for failure to supervise or a lack of training. *Hardy v. District of Columbia, 601 F.2d 182 DC 2009.*

82. AT LAST PLAINTIFF SPICER BRING'S EQUAL PROTECTION COMPLAINT'S ON THE DEFENDANT'S AS HE IS TO BE FREE FROM DISCRIMINATION. GUARDS IN THIS CASE ALONG WITH THERE CO WORKERS CALL THE PLAINTIFF FAGGOT, NUTCH, NIGGER, JIG, QUEER, AND ALL SORTS OF NAME'S IN FRONT OF ALL THE INMATE'S AND OFFICER'S ALMOST DAILY IN SH. IN VIOLATION OF HIS FREEDOM FROM RACIAL DISCRIMINATION.

V. LEGAL CLAIMS

83. THE PLAINTIFF'S REALLEGE AND INCORPORATE
BY REFERENCE PARAGRAPHS 1 - 82

84. FOR THE FORE GOING REASONS THE PLAINTIFF'S
RIGHTS UNDER THE UNITED STATES CONSTITUTION
HAVE BEEN VIOLATED BY BEATING, CRUEL AND
UNUSUAL PUNISHMENT, EXCESSIVE USE OF FORCE,
BEING DELIBERATE INDIFFERENT TO OUR MEDICAL
NEEDS, UNSAFE CONDITIONS OF CONFINEMENT,
AND DISCRIMINATION ALONG WITH OTHER RIGHTS.

THE PLAINTIFF'S EIGHTH AMENDMENT RIGHTS
HAVE BEEN VIOLATED UNDER THE UNITED
STATES CONSTITUTION.

THE PLAINTIFF'S FOURTEENTH AMENDMENT
RIGHTS HAVE BEEN VIOLATED UNDER THE
UNITED STATES CONSTITUTION.

PLAINTIFF LEE, CONRAO, AND SPICER HAVE
HAD THEIR EIGHTH, FOURTEENTH AND RIGHT
EQUAL PROTECTION RIGHTS VIOLATED

85. THE PLAINTIFF HAS NO PLAIN, ADEQUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DESCRIBED HEREIN. THE PLAINTIFFS HAVE BEEN AND WILL CONTINUE TO BE IRREPARABLY INJURED BY THE CONDUCT OF THE DEFENDANTS UNLESS THIS COURT GRANTS THE DECLARATORY AND INJUNCTIVE RELIEF WHICH THE PLAINTIFFS SEEK

VI PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY PRAYS THAT THIS COURT ENTER JUDGMENT GRANTING PLAINTIFF:

86. A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF'S RIGHTS UNDER THE CONSTITUTION OF THE UNITED STATES.

87. A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANT'S JOHN DOE #2, F. RUTLEDGE, D. SHINN JOHN DOE #1, J. BUNSOLD, D. DEGOEY, E. VELEZ, . MORENO, C. HERRERA TO GET CONRAD, SPICER, LEE IMMEDIATE CARE FOR THERE SERIOUS MEDICAL CONDITIONS. TO GET CONRAD HIS REGULAR PAIN MANAGMENT MEDICATION OF LYRICA AND PAIN MANAGMENT MEDICATIONS AS WELL AS HIS PSYCH MEDICATION. THAT CONRAD IS TRANSFERRED TO A F.M.C. FEDERAL MEDICAL CENTER, AND OUT OF ISOLATION IN SHV on THE HOLE.

88. COMPENSATORY DAMAGES IN THE AMOUNT OF \$ 1.65 MILLION OR 1,650,000.00 AGAINST EACH DEFENDANT, JOINTLY AND SEVERALLY.
89. PUNITIVE DAMAGES IN THE AMOUNT OF 2 MILLION DOLLARS OR \$ 2,000,000.00 AGAINST EACH DEFENDANT.
90. A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY
91. PLAINTIFF'S COSTS IN THIS SUIT
92. ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST, PROPER, AND EQUITABLE.

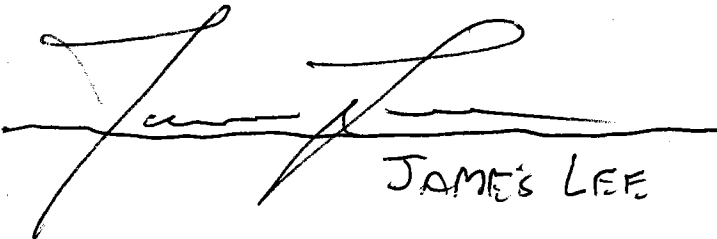
VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT
AND HEREBY VERIFY THAT THE MATTER'S
ALLEGED THEREIN ARE TRUE UNDER
THE PENALTY OF PERJURY.

RESPECTFULLY SUBMITTED



DAVID E CONRADO



JAMES LEE



DEONTE SPICER

04/12/2017

DATE.

EXHIBIT - A - LEE
IN HIS OWN WORDS.

IN October of 2007 I was Diagnosed with Multiple Sclerosis after months of extensive MRI's and Lumbar Punctures. My Primary Care Physician Dr. Robert Atkins at Somerville Hospital in Somerville, Massachusetts - Referred me to Dr. Dhruvi Padamanaban a Neurologist at Wadden Memorial Hospital in Everett, Massachusetts. Dr. Padamanaban became my Primary Neurologist, as he began to Treat my M.S. Dr. Padamanaban went on to diagnose my facial Pain as Trigeminal Neuralgia and the loss of Vision in my left eye as Optic Neuritis (an opinion that was supported by Dr. Misha Aless at Massachusetts Eye and Ear as a Second Opinion). Through many Trials of medications and Multiple Sclerosis treatment Plans, Dr. Padamanaban and myself settled on Copaxone (a self injecting M.S. treatment).

Due to my Immobility and stagnant state as my Body Adjusted to the Copaxone I developed Two Separate Blood Clots, One in my Right leg and One in my left Calf roughly 6 months apart. Due to the Extensive Blood Thinning Regimen I was put on (Wafarin + Lovinox) My Primary Care Physician Dr. Atkins told me that I Became slightly Anemic and put me on yet another Medication to try to give me back some of my Energy. So when I came to Prison I had a laundry list of Ailments as well as medications.

Coming Into Prison is was Officially & Clearly Diagnosed with Multiple Sclerosis, Tri-Geminal Neuralgia, Optic Neuritis, Anemia & Chronic D.V.T. (Deep Vein Thrombosis or Blood Clots). The Medications I was on were Tramadol, Baclofen, Gabapentin, Copaxone - for the M.S. Xanax, Citalopram, Doxaprin for the Anxiety of Dealing with the MS - I had the Asclerall Added for the Anemia. I has just been taken off the Warfarin & Coumadin because my Blood had evened out.

Since being in the Bureau of Prison's The only Medications I have been on was Gabapentin & Baclofen. For Different Penitentiaries have tried my on Tegretol, Oxcarbazepine and Cymbalta - Even Though (A) They are all Psych Drugs and (B) I tried them all on the streets and told every Doctor I've seen that none of them work for me. Despite the Numerous MRI's I've had at Every Institution I've been in and all the Outside Neurologists I've been to in Kentucky, Florida & Indiana Verifying my Conditions - I still Denied medication as well as my M.S. medication Copaxone. Nobody has listened to any of the Neurologists suggestions, They have even taken me off the Gabapentin (the only medication that has worked in the B.O.P.)

My M.S. has gotten gradually & progressively worse, My flare ups that had been controlled to maybe once a year, now they are happening Weekly, so it's like one constant Relapse! My Optical nerve burns Daily & The Neuralgia is unbearable. The lack of Medication and Treatment has led to my Alzheimer's Blowing out of Proportion.

TO: CLERK OF THE COURT

THIS IS MY ONLY COPY OF THE

PAPER'S I HAVE AND THE ORIGINAL

COPY. I AM IN 24 HOUR LOCKDOWN

WITH NO WAY TO GET COPIES MADE.

IF THIS IS RETURNED PLEASE MAKE

COPIES SO I WILL HAVE THEM IF

YOU CAN. AS YOU CAN GUESS IT TOOK

A LONG TIME TO WRITE WITH A "FLEX PEN"

IN JHV AND I DON'T WANT TO LOSE IT

ALL. THIS WAS THE ONLY WAY I COULD

DO THIS COMPLAINT IN MY SITUATION

THANK YOU!!

Daniel C. C. C.

DAVID CONRAD 18317-424

FEDERAL CORRECTIONAL INSTITUTION #2

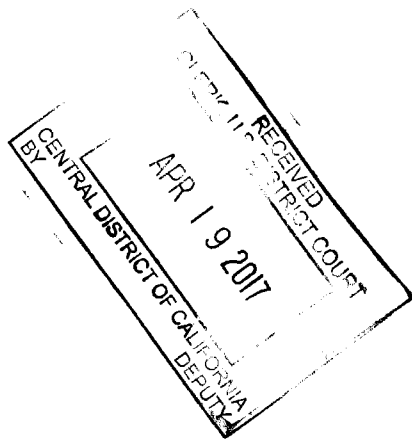
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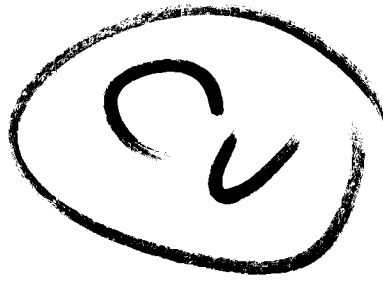


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EXAMPLE

DATE: COPY TO:
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200 N. BAYVIEW AVE.
P.O. BOX 19000
MIAMI, FL 33129
ADVIS: This document was processed through Special Agent [redacted] and was forwarded to the Miami Office for forwarding to the FBI. This document contains no information that is factual or confidential in nature.
Thank you for your cooperation.
Sincerely,
[redacted]
has been advised that this document is for [redacted] and should be returned to the [redacted] office to which it was sent.
Please return the enclosure to [redacted] for the [redacted] office.
If the letter address is not correct, please return the enclosure to the above address.

710W

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